

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF ALABAMA

IN RE:) CHAPTER 13
WILLIE TATUM)
Debtor(s).) CASE NO. 16-30286-DHW-13

OBJECTION TO CONFIRMATION

Now comes ALABAMA STATE EMPLOYEES C.U., by its attorneys, Chambless Math
❖ Carr, P.C., and objects to confirmation of the Debtor's proposed plan and in support thereof
states as follows:

1. This creditor has filed an unsecured claim in the amount of \$571.42 for charges
incurred on an open end line of credit January 6, 2016 through January 18, 2016.

2. The plan is filed in bad faith and may not be confirmed pursuant to 11 U.S.C. Section
1325(a)(3). The Debtor incurred the total of the debt to this creditor within 30 days of the date of
filing and the plan makes no provision to repay this newly incurred debt.

3. The Debtor deposited a check in the amount of \$26,501.56 into his account December
28, 2015. The debtor testified that he has Power of Attorney for his mother and the funds were
actually hers. Counsel for this creditor has requested the document several times from counsel
for the Debtor, but it has not been produced. Further, all of the funds were withdrawn after the
deposit and the account went negative approximately two weeks afterward.

4. Further, the Debtor has used another person's social security number to open accounts
with this creditor. The Debtor testified that he has Power of Attorney over his uncle who bears
the same name and it must have been a mistake. However, this mistake was repeated several
times to open several accounts with this creditor.

WHEREFORE, ALABAMA STATE EMPLOYEES C.U., prays for an Order denying

confirmation along with such further relief as the Court may deem proper.

ALABAMA STATE EMPLOYEES C.U.

By: /s/ Leonard N. Math

Of Counsel:

Chambless Math ❖ Carr, P.C.

P.O. Box 230759

Montgomery, Alabama 36123-0759

(334) 272-2230

lmath@chambless-math.com

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served on all attorneys of record as set forth below by electronic notice and/or depositing a copy thereof in the United States mail postage prepaid on this April 22, 2016.

Curtis C. Reding

Chapter 13 Trustee

P.O. Box 173

Montgomery AL 36101

Richard D Shinbaum

SHINBAUM & CAMPBELL

P.O. BOX 201

MONTGOMERY AL 36101

WILLIE TATUM

PO BOX 680073

PRATTVILLE AL 36067

/s/ Leonard N. Math